

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>In re: Procter &amp; Gamble Aerosol Products Marketing and Sales Practices Litigation</b>	: : : : :	Case No. 2:22-md-3025  Judge Michael H. Watson  Magistrate Judge Chelsey Vascura
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**This document relates to: ALL CASES**

**NON-SETTLING PLAINTIFFS' UNOPPOSED MOTION TO SEAL OPPOSITION  
TO MOTION FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Pursuant to S.D. Ohio Civ. R. 5.2.1, the Court's Protective Order dated May 19, 2022 (ECF 18), the Non-Settling Plaintiffs ("NSPs"), through the undersigned, respectfully move for permission to file under seal their opposition to the Settling Plaintiffs' ("SPs") motion for preliminary approval of proposed class action settlement (ECF 23). In support of this motion, NSPs state as follows:

1. On July 1, 2022, SPs filed their motion for preliminary approval of proposed class action settlement.
2. NSPs intend to oppose that motion.
3. NSPs' opposition contains and attaches materials or information that were designated as Confidential pursuant to this Court's Protective Order (ECF 18) by the producing party (Defendant P&G).
4. Given the producing party's designations, and to preserve legitimate confidentiality concerns, good cause exists to allow NSPs to file an unredacted version of its

opposition and related materials under seal. *See, e.g., Protcor & Gamble Co. v. Bankers Trust Co.*, 78 F.3d 219, 227 (6th Cir. 1996).

5. NSPs shall file a redacted version on the publicly available docket.
6. Defendant does not oppose this motion.

WHEREFORE, NSPs respectfully request the Court permit NSPs to file their opposition and related materials under seal.

Dated: July 22, 2022

Respectfully submitted,

/s/ Ruben Honik  
Ruben Honik  
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*Counsel for Plaintiffs Amselem and Clayton*

**CERTIFICATE OF SERVICE**

I certify that on July 22, 2022, this document was served on all parties of record via email through the Court's CM/ECF system.

By: /s/ Ruben Honik  
Ruben Honik